

1. “Concerning” means referring to, describing, evidencing, or constituting. See LR Civ. P 26.2(c)(7).

2. “Defendants,” “Ethicon, Inc.,” “Johnson & Johnson Inc.,” “you” or “your” refers to, without limitation, Ethicon, Inc. and Johnson & Johnson Inc., and all business entities with which it is or has been affiliated, together with any predecessor, successor, parent, or subsidiary entity, as well as any officer, director, employee, attorney, agent, or representative of any such other business entity previously described herein.

3. “Document” is synonymous in meaning and equal in scope to the usage of this term in Rule 34(a) of the Federal Rules of Civil Procedure and expressly includes writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any medium from which information can be obtained either directly or, if necessary, after translation by you into a reasonably usable form. A draft or non-identical copy is a separate document. *See* LR Civ. P. 26.2(c)(2); *see also* FR Civ. P 34(a).

4. “TVT-R” means the Tension Free Vaginal Tape Retropubic System device that was cleared by the FDA on or about January 28, 1998, which was developed, designed, distributed, licensed, manufactured, marketed or sold for the treatment of Stress Urinary Incontinence (SUI).

5. “Relevant Time Period” means the time period from when you first developed, designed, distributed, licensed, manufactured, marketed or sold TVT-R anywhere in the world to the present.

PLAINTIFFS' CO-LEAD COUNSEL

Dated: December 20, 2013

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EXHIBIT "A"

DEPOSITION SUBJECT MATTER

Pursuant to Rule 30(b)(6), the deponent(s) must have knowledge and shall be able to testify concerning the following subject matters:

1. The sales, revenues, profits, and income you generated, earned, and/or received annually from 1998 to the present due to sales of the TVT-R in the United States, including but not limited to the cost per unit sold and the number of units sold.
2. The sales, revenues, profits, and income you generated, earned, and/or received annually from 1998 to the present due to sales of the TVT-R world-wide, including but not limited to the cost per unit sold and the number of units sold.
3. The annual unit sales for the TVT-R sold with mechanically cut mesh in the United States from 1998 to the present.
4. The annual unit sales for the TVT-R sold with mechanically cut mesh world-wide in the United States from 1998 to the present.
5. The annual unit sales for the TVT-R sold with laser-cut mesh in the United States from 1998 to the present.
6. The annual unit sales for the TVT-R sold with laser-cut mesh world-wide from 1998 to the present.
7. The annual unit sales for the TVT-R sold with clear mesh in the United States from 1998 to the present.
8. The annual unit sales for the TVT-R sold with clear mesh world-wide from 1998 to the present.
9. The annual unit sales for the TVT-R sold with blue mesh in the United States from 1998 to the present.
10. The annual unit sales for the TVT-R sold with blue mesh world-wide from 1998 to the present.

EXHIBIT “B”

DOCUMENT REQUESTS

Please produce:

1. All documents relied upon by the deponent in preparing for this deposition.
2. Any and all documents reflecting the sales, revenues, profits, and income you generated, earned, and/or received annually from 1998 to the present due to sales of the TVT-R in the United States, including but not limited to the cost per unit sold and the number of units sold.
3. Any and all documents reflecting the sales, revenues, profits, and income you generated, earned, and/or received annually from 1997 to the present due to sales of the TVT-R world-wide, including but not limited to the cost per unit sold and the number of units sold.